

EX PARTE OR LATE FILED

1401 H Street N.W.  
Suite 1020  
Washington, D.C. 20005  
Office 202/326-3800  
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June 2, 1994

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JUN 2 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

RE: Ex Parte Statement  
Docket No. 90-314

Dear Mr. Caton:

The attached Ex Parte Statements, issued May 9, 1994 and May 19, 1994, were inadvertently issued under the wrong docket number. The docket number for both Ex Parte Statements should have been Docket No. 90-314. We apologize for any inconvenience this may have caused.

Sincerely,

A handwritten signature in cursive script, appearing to read "Toni R. Acton". The signature is written in dark ink and is positioned above the typed name and title.

Toni R. Acton  
Administrative Assistant

Attachments

No. of Copies rec'd  
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1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005  
Office 202/326-3815

**RECEIVED**  
**MAY 20 '94**  
James K. Smith  
Director  
Federal Relations  
FEDERAL COMMUNICATIONS COMMISSION  
OF THE  
SECRETARY

May 19, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

RE: Ex Parte Statement  
Docket No. 93-14

Dear Mr. Caton:

On May 19, 1994, Mr. Kenneth Hallman, Supervisor - Wireless Radio Technology of Ameritech and I met with Ms. Karen Brinkman, Special Assistant to Chairman Hundt, Mr. Rudy Baca, Legal Advisor to Commissioner Quello, and Mr. Byron Marchant, Senior Advisor to Commissioner Barrett to discuss Ameritech's position in the above referenced proceeding. The attached information was used as the basis for our discussion.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Smith", written in dark ink.

Attachment

cc: K. Brinkman  
R. Baca  
B. Marchant



**Anthony M. Alessi**  
Director  
Federal Relations

May 9, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

RECEIVED  
MAY 29 1994  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

RE: Ex Parte Statement  
Docket No. 93-14

Dear Mr. Caton:

On May 6, 1994, Mr. Kenneth Hallman, Supervisor - Wireless Radio Technology of Ameritech and I met with Mr. Ralph Haller, Chief, Private Radio Bureau, Mr. Jonathan Cohen, Special Counsel, Office of Plans and Policy, and Ms. Julia Kogan, Attorney, Private Radio Bureau to discuss Ameritech's position in the above referenced proceeding. The attached information was used as the basis for our discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony M. Alessi". The signature is fluid and cursive, with the first name "Anthony" written in a larger, more prominent script than the last name "Alessi".

Attachment

cc: R. Haller  
J. Cohen  
J. Kogan

1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005  
Office 202/326-3822



**Anthony M. Alessi**  
Director  
Federal Relations

May 9, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

RE: Ex Parte Statement  
Docket No. 93-14

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Attachment

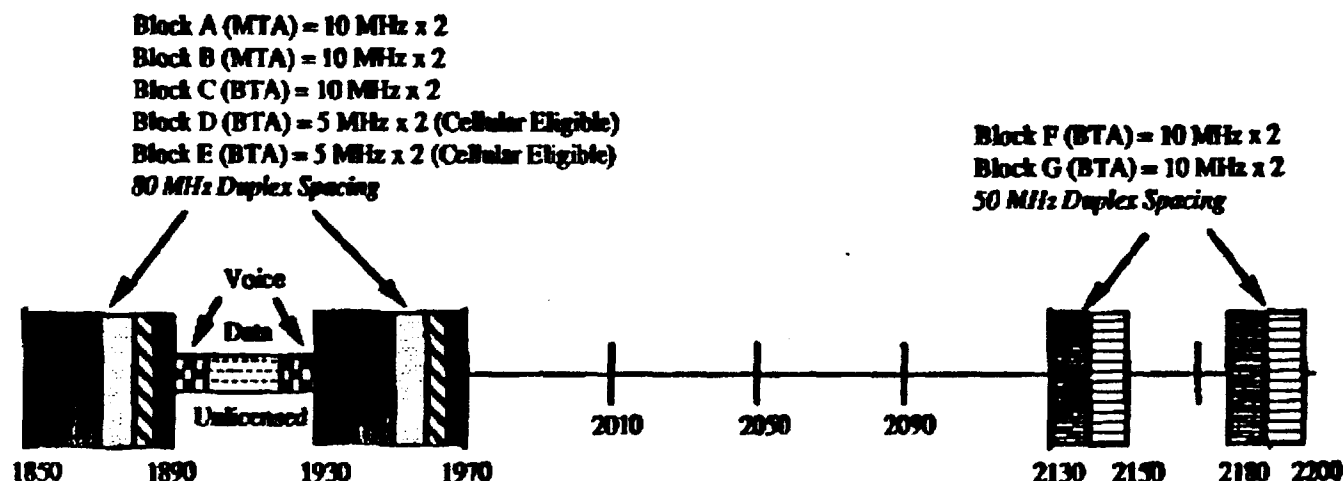
cc: R. Haller  
J. Cohen  
J. Kogan

# Overview

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- **Ameritech Is A Wireless Leader**
  - One of The Most Comprehensive PCS Trials In The Nation
- **Supportive of Expanded Competition and Prompt Licensing**
- **Recommend Modifications To Licensing Framework:**
  - **Five 20 MHz Blocks and Two 10 MHz Blocks**
  - **Cellular Eligibility For 10 MHz At 1.9 GHz**
  - **30% Cellular Ownership Interest Threshold**

# Proposed Revision To PCS License Allocation



- **Five Licenses At 1.9 GHz**
  - Two 20 MHz MTAs
  - One 20 MHz and Two 10 MHz BTAs
  - One MTA License Per Operator
  - Aggregation Up To 40 MHz
  - Cellular Eligible To Bid On 10 MHz BTAs
- **Two Licenses At 2.1 GHz**
  - Two 20 MHz BTAs

# **20 MHz Blocks And Aggregation Is Spectrally Efficient & Pro-Competitive**

- Spectrum Clearing Not A Major Issue At 1.9 GHz:**

Number of Links Nationwide In Original Block C (20 MHz) = 761

Average Cost To Move A Link = \$150,000

Nationwide Pops = 260 Million

- 45¢/Pop To Relocate EVERY Microwave Link In Original Block C
- Spectrum Sharing Costs Will Be Reflected In The Auction
- Microwave Relocation Costs A Small Percentage Of Total Capital
- Site Acquisition And System Build-Out Will Gate System Start Up, Not Spectrum Clearing
- Capacity Is Not An Issue With Clear Spectrum\*

	City Mkt. Share	Suburban Mkt. Share
1 Mile Radius	89%	404%
2 Mile Radius	22%	99%
4 Mile Radius	5.5%	25%
10 Mile Radius	N.A.	4%

\* Assuming: Upbanded IS-95 (CDMA), 20 MHz Clear Spectrum, 30% Penetration, Pops/Sq. Mi. = 4200 City, 930 Suburban (Rand McNally Metro Averages), 2% Erlang B, Omnidirectional Cells, & .05 E/Sub.

# **Advantages To Ameritech's Proposal**

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- **Spectrum Fully Utilized By Those Who Value It Most**
- **Better For Aggregation**
  - **40 MHz Limit**
  - **Two 1.9 GHz MTA Licenses In Every Market - BTAs Can Be Used To Supplement Congested Areas**
  - **Rational Economic Aggregation To No Less Than Three New Operators**
  - **Allows Aggregation In The Same Band**
- **Two 20 MHz Licenses At 2.1 GHz Are Better For Spectrum Sharing And Long Term Capacity Considerations**



# **Cellular Eligibility At 1.9 GHz**

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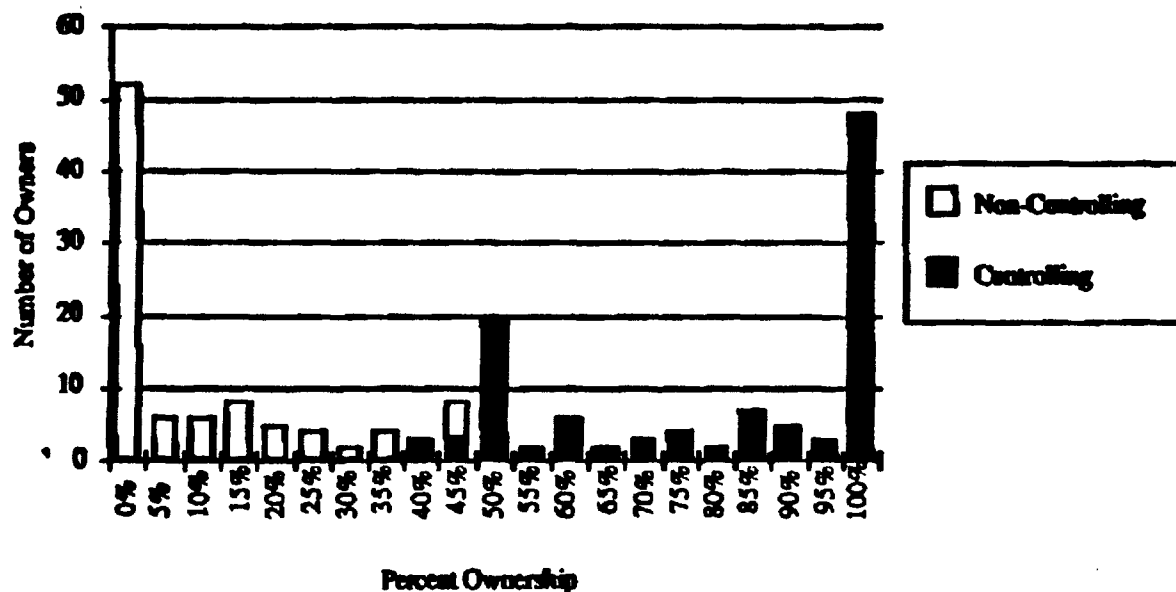
- **Cellular Eligibility For 10 MHz At 1.9 GHz**
  - **Limits Aggregated Spectrum To 35 MHz**
  - **Facilitates Nationwide Interoperability**
  - **Increases Likelihood Of Nationwide Ubiquity**
  - **Lessens Need For Multi-mode/Multi-frequency Handsets**
  - **Low Tier Services Can Still Be Selectively Deployed**
- **2.1 GHz Band Better Suited For Low Tier Services**
  - **2.1 GHz Much More Congested With Microwave**
  - **15% More Cells Needed For Broad Area Coverage (Versus 1.9 GHz)**
  - **Cellular Equipment Availability Delayed At 2.1 GHz**

# Cellular Eligibility Threshold

- Support 10% Population Limit
- 20% Ownership Interest Is Too Low

**Top 50 MSAs\* Show Ownership Limit Should Be Raised To 30%**

Cellular Ownership Percentages - Top 50 MSAs  
Wireline/Non-Wireline



- 20% Unnecessarily Excludes Dozens of Non-Controlling Interests Over All Partnerships
- 30% Excludes Only A Few Non-Controlling Partners But Enables The Commission To Establish A Simple Rule

- Don't Penalize Those Who Were Encouraged By The Commission To Take Passive Partnership Interests In The Initial Phase Of Cellular